

FILED
IN CLERK'S OFFICE

SUCV2003-04685

James et al v Ambrosino, Mayor City Revere et al

File Date	10/06/2003	Status	Disposed: transfered to other court (dtrans)
Status Date	12/31/2003	Session	G - Civil G
Origin	1	Case Type	B22 - Employment Discrimination
Lead Case		Track	F

Service	01/04/2004	Answer	03/04/2004	Rule 12/19/20	03/04/2004
Rule 15	03/04/2004	Discovery	08/01/2004	Rule 56	08/31/2004
Final PTC	09/30/2004	Disposition	11/29/2004	Jury Trial	Yes

PARTIES

Plaintiff

Terri Pechner James
Active 10/06/2003

Plaintiff

Sonia Fernandez
Active 10/06/2003

Defendant

Terri Ambrosino, Mayor City Revere
Service pending 10/06/2003

Private Counsel 124360

James Dilday
Grayer & Dilday
27 School Street
Boston, MA 02108
Phone: 617-227-3470
Fax: 617-227-9231
Active 10/06/2003 Notify

*** See Attorney Information Above ***

Private Counsel 538800

Ira H Zaleznik
Lawson & Weitzen
88 Black Falcon Avenue
Suite 345
Boston, MA 02210-2414
Phone: 617-439-4990
Fax: 617-439-3987
Active 12/31/2003 Notify

Private Counsel 558565

Michael J Akerson
Reardon Law Offices (Edward P)
397 Grove Street
Worcester, MA 01605
Phone: 508-754-7285
Fax: 508-754-7220
Active 12/31/2003 Notify

Commonwealth of Massachusetts
SUFFOLK SUPERIOR COURT
Case Summary
Civil Docket

12/31/2003
02:56 PM

SUCV2003-04685
James et al v Ambrosino, Mayor City Revere et al

Defendant

Terrency Reardon, Chief Revere Police Department
Service pending 10/06/2003

Defendant

Bernard Foster, Lieutenant Revere Police
Department
Service pending 10/06/2003

Private Counsel 255040

Austin M Joyce
Reardon Law Offices (Edward P)
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SUCV2003-04685
James et al v Ambrosino, Mayor City Revere et al

Defendant

Steven Ford, Lieutenant Revere Police Department
Service pending 10/06/2003

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SUCV2003-04685
James et al v Ambrosino, Mayor City Revere et al

Defendant

Salvatore Santoro, Officer & Supervisor Revere
Police Dept
Service pending 10/06/2003

Private Counsel 538800

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Active 12/31/2003 Notify

Defendant

Roy Colannino, Officer & Supervisor Revere Police
Dept
Service pending 10/06/2003

Private Counsel 538800

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SUCV2003-04685**James et al v Ambrosino, Mayor City Revere et al****Defendant**

Frederick Roland, Officer & Supervisor
Service pending 10/06/2003

Private Counsel 255040

Austin M Joyce
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Fax: 508-754-7220
Active 12/31/2003 Notify

Defendant

Thomas Doherty, Officer & Supervisor Revere
Police Dept
Service pending 10/06/2003

Private Counsel 538800

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SUCV2003-04685

James et al v Ambrosino, Mayor City Revere et al

Defendant

John Nelson, Officer & Supervisor Revere Police
Service pending 10/06/2003

Private Counsel 558565

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SUCV2003-04685
James et al v Ambrosino, Mayor City Revere et al

Defendant

James Russo, Chief Police Revere Police Dept &
Supervisor
Service pending 10/06/2003

Private Counsel 538800

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Defendant

Michael Murphy, Officer & Supervisor Revere
Police De[t
Service pending 10/06/2003

Private Counsel 538800

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SUFFOLK SUPERIOR COURT

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ENTRIES

Date	Paper	Text
10/06/2003	1.0	Complaint filed with request for trial by jury
10/06/2003		Origin 1, Type B22, Track F.
10/06/2003	2.0	Civil action cover sheet filed
12/15/2003		Certified copy of petition for removal to U. S. Dist. Court of Defts. CITY OF REVERE, THOMAS AMBROSINO, MAYOR AND TERENCE REARDON, CHIEF OF POLICE, BERNARD FOSTER, SALVATORE SANTORO, ROY COLANNINO, FREDERICK ROLAND, THOMAS DOHERTY, JOHN NELSON, JAMES RUSSO, MICHAEL MURPHY, AND STEVEN FORD U. S. Dist.#903-CV12499MLW).
12/31/2003		Case REMOVED this date to US District Court of Massachusetts

EVENTS

HEREBY ATTEST AND CERTIFY ON

DEC. 31, 2003, THAT THE

FOREGOING DOCUMENT IS A FULL,
TRUE AND CORRECT COPY OF THE
ORIGINAL ON FILE IN MY OFFICE,
AND IN MY LEGAL CUSTODY.

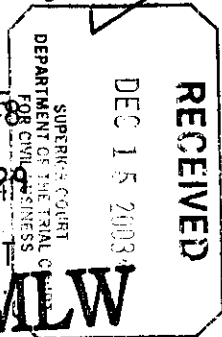
MICHAEL JOSEPH DONOVAN
CLERK / MAGISTRATE
SUFFOLK SUPERIOR CIVIL COURT
DEPARTMENT OF THE TRIAL COURT

BY

ASSISTANT CLERK

Suffolk Superior Civil # 03-4685

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS



Terri Pechner-James and
Sonia Fernandez,
Plaintiff,

03 CV 12499 MLW

v.

City of Revere, Thomas Ambrosino, Mayor,
City of Revere Police Department, Terrence
Reardon, Chief of Police, Bernard Foster,
Salvatore Santoro, Roy Colannino, Frederick
Roland, Thomas Doherty, John Nelson,
James Russo, Michael Murphy, and Steven Ford
Defendants.



I HEREBY CERTIFY AND GUARANTEE THAT THE FOREGOING DOCUMENT IS A FULL, TRUE AND CORRECT COPY OF THE ORIGINAL ON FILE IN MY OFFICE AND IN MY LEGAL CUSTODY.

NOTICE OF REMOVAL

CLERK, U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS
BY: *[Signature]*

The Defendants, CITY OF REVERE, THOMAS AMBROSINO, MAYOR and
TERRENCE REARDON, CHIEF OF POLICE, BERNARD FOSTER, SALVATORE
SANTORO, ROY COLANNINO, FREDERICK ROLAND, THOMAS DOHERTY,
JOHN NELSON, JAMES RUSSO, MICHAEL MURPHY, AND STEVEN FORD
hereby file this Notice of Removal pursuant to 28 U.S.C. § 1441 and § 1446 for removal
from the Superior court Department of the Trial Court of the Commonwealth of
Massachusetts, Suffolk County, the action entitled, Terri Pechner-James and Sonia
Fernandez v. City of Revere, et al. pending as Civil Action No. 03-4685G. The defendants
state the following:

1. Removing parties are all of the defendants in the above-entitled action.
2. On or about October 8, 2003, the Plaintiffs filed this action in Suffolk

Superior Court of the Commonwealth of Massachusetts. A copy of the Complaint and all other process received in connection with this matter are attached as Exhibit A hereto.

3. On November 11, 2003, Defendants City of Revere, Thomas Ambrosino, Mayor, Terrence Reardon, Chief of Police, accepted service of the summons and complaints. On information and belief, all other defendants have been served with process thereafter.
4. This Notice of Removal is filed within thirty (30) days of service of the summons and Plaintiffs' complaint.
5. This action involves claims that the Defendants sexually harassed the Plaintiffs and created a hostile work environment all in violation of the provisions of 42 U.S.C. § 2000(e)2. Plaintiffs allege that they are bringing their claims pursuant to 42 U.S.C. § 1983.
6. This Court has original jurisdiction of this action pursuant to 28 U.S.C. § 1331, and the action may therefore be removed to this Court by the Defendants by virtue of the provisions of 28 U.S.C. § 1441 and pursuant to 28 U.S.C. § 1446. The pendant state law claims may be heard and decided by this Court.
7. Notice of Removal will be given to all counsel promptly after filing this notice and a true and accurate copy of this notice will be filed with the Clerk of the Suffolk Superior Court.
8. Certified or attested copies of all records, proceedings, and docket entries in

the state court will be filed in this Court within 30 days, pursuant to Local Rule 81.1.

Wherefore, the Defendants CITY OF REVERE, THOMAS AMBROSINO, MAYOR and TERRENCE REARDON, CHIEF OF POLICE, BERNARD FOSTER, SALVATORE SANTORO, ROY COLANNINO, FREDERICK ROLAND, THOMAS DOHERTY, JOHN NELSON, JAMES RUSSO, MICHAEL MURPHY, AND STEVEN FORD give Notice of Removal of all claims against all Defendants from the Superior Court of Suffolk County, Massachusetts to this Court and respectfully request that this action proceed in this Court as an action properly removed to it.

Signed pursuant to Fed.R.Civ.P.11 that the statements of fact in the petition are true and correct to the best of my knowledge, information and belief and signed under the pains and penalty of perjury.

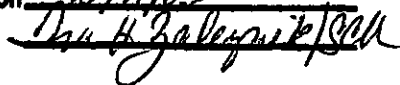
I HEREBY ATTEST AND CERTIFY ON

DEC. 31, 2003, THAT THE
FOREGOING DOCUMENT IS A FULL,
TRUE AND CORRECT COPY OF THE
ORIGINAL ON FILE IN MY OFFICE,
AND IN MY LEGAL CUSTODY.

MICHAEL JOSEPH DONOVAN
CLERK / MAGISTRATE
SUFFOLK SUPERIOR CIVIL COURT
DEPARTMENT OF THE TRIAL COURT

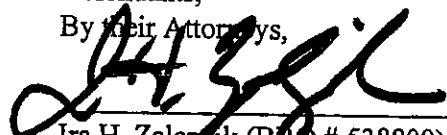
By: 
ASSISTANT CLERK.

I hereby certify that a true copy of the above
document was served upon (each party
appearing pro se and) the attorney of record
for each other party by mail - hand -
telecopier, on 12/11/03



Dated: 12/11/03

Defendants,
By their Attorneys,



Ira H. Zaleznik (BBO # 538800)
Lawson & Weitzen, LLP
88 Black Falcon Avenue, Suite 345
Boston, MA 02210
Tel. (617) 439-4990



Michael J. Akerson, Esq. (BBO#558565)
Austin M. Joyce, Esq. (BBO#255040)
Edward P. Reardon, PC
397 Grove Street
Worcester, MA 01605
Tel. (508) 754-7285

COMMONWEALTH OF MASSACHUSETTS
SUFFOLK, ss. SUPERIOR COURT
C.A. NO.: 03-4685G

Terri Pechner-James and)
Sonia Fernandez,)
Plaintiff,)
v.)
City of Revere, Thomas Ambrosino, Mayor,)
City of Revere Police Department, Terrence)
Reardon, Chief of Police, Bernard Foster,)
Salvatore Santoro, Roy Colannino, Frderick)
Roland, Thomas Doherty, John Nelson,)
James Russo, Michael Murphy, and Steven Ford))
Defendants.)

SUFFOLK SUPERIOR COURT
CIVIL DEPT. 15
DEC 15 P 2:47
CLERK'S OFFICE

WRITTEN NOTICE OF REMOVAL TO FEDERAL
COURT PURSUANT TO 28 U.S.C. § 1446(D)

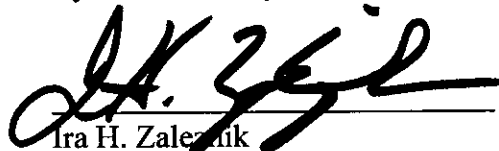
TO: James S. Dilday, Esq.
Carlton J. Dasent, Esq.
27 School Street, Suite 400
Boston, MA 02108

AND: Civil Clerk
Suffolk Superior Court
Room 807, 8th Floor
90 Devonshire
Boston, MA 02108

Please take notice that a Notice of Removal of the above-captioned action from the Superior Court of the Commonwealth of Massachusetts (a copy of which Notice of Removal is attached hereto) was duly filed in the United States District Court for the District of Massachusetts.

Please take further notice that this Notice and a copy of the Notice of Removal, certified by the United States District Court for the District of Massachusetts, had been duly filed with the Clerk of the Superior Court of the Commonwealth of Massachusetts, Suffolk County, which filing removes this action and, in accordance with 28 U.S.C. § 1446(d), the Superior Court shall proceed no further herein unless and until this case is remanded by the United States District Court.

Defendants,
By their Attorney,



Ira H. Zaleznik
Lawson & Weitzen, LLP
88 Black Falcon Avenue, Suite 345
Boston, MA 02210
Tel. (617) 439-4990
BBO # 538800



Michael J. Akerson, Esq. (BBO#558565)
Austin M. Joyce, Esq. (BBO#255040)
Edward P. Reardon, PC
397 Grove Street
Worcester, MA 01605
Tel. (508) 754-7285

Dated: December 11, 2003

Commonwealth of Massachusetts

SUFFOLK, ss.

SUPERIOR COURT DEPARTMENT
OF THE TRIAL COURT
CIVIL ACTION

03-4685 G

No. _____

Terri Pechner-James and Sonia Fernandez

, Plaintiff(s)

v.

City of Revere, et al

, Defendant(s)

 RECEIVED
CITY OF REVERE
03 OCT -8 PM 2:10
SOLICITOR

SUMMONS

 To the above-named Defendant: Terrance Reardon, Chief of Revere Police Dept.
James S. Dilday, Esquire

You are hereby summoned and required to serve upon _____

 _____ Grayer & Dilday, 27 School Street, Suite 400
 plaintiff's attorney, whose address is _____ Boston, MA 02108 _____, an answer to
 the complaint which is herewith served upon you, within 20 days after service of this summons upon you,
 exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the
 relief demanded in the complaint. You are also required to file your answer to the complaint in the office
 of the Clerk of this court at Boston either before service upon plaintiff's attorney or within a reasonable
 time thereafter.

 Unless otherwise provided by Rule 13(a), your answer must state as a counterclaim any claim which
 you may have against the plaintiff which arises out of the transaction or occurrence that is the subject
 matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

 Witness, Suzanne V. DeVecchio, Esquire, at Boston, the _____ 7th _____ day of
 October _____, in the year of our Lord two thousand _____ three _____.

Clerk/Magistrate

NOTES.

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure.
2. When more than one defendant is involved, the names of all defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.
3. TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED
 (1) TORT — (2) MOTOR VEHICLE TORT — (3) CONTRACT — (4) EQUITABLE RELIEF — (5) OTHER

Commonwealth of Massachusetts

SUFFOLK, ss.



SUPERIOR COURT DEPARTMENT
OF THE TRIAL COURT
CIVIL ACTION

No. 03-4685 G

Terri Pechner-James and Sonia Fernandez, Plaintiff(s)

v.

City of Revere, et al, Defendant(s)

SUMMONS

To the above-named Defendant: Thomas Ambrosino, Mayor, City of Revere

You are hereby summoned and required to serve upon James S. Dilday, Esquire

plaintiff's attorney, whose address is Grayer & Dilday, 27 School Street, Suite 400, Boston, MA 02108, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Boston either before service upon plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by Rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Suzanne V. DeVecchio, Esquire, at Boston, the 7th day of October, in the year of our Lord two thousand three.

Michael Joseph Donovan

Clerk/Magistrate

NOTES.

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure.
2. When more than one defendant is involved, the names of all defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.
3. TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED
(1) TORT — (2) MOTOR VEHICLE TORT — (3) CONTRACT — (4) EQUITABLE RELIEF — (5) OTHER

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

1. Title of case (name of first party on each side only) Terri Pechner-James, et al. vs. City of Revere, et al.
2. Category in which the case belongs based upon the numbered nature of suit code listed on the civil cover sheet. (See local rule 40.1(a)(1)).
- ☐ I. 160, 410, 470, R.23, REGARDLESS OF NATURE OF SUIT.
- ☒ II. 195, 368, 400, 440, 441-444, 540, 550, 555, 625, 710, 720, 730, 740, 790, 791, 820*, 830*, 840*, 850, 890, 892-894, 895, 950. *Also complete AO 120 or AO 121 for patent, trademark or copyright cases
- ☐ III. 110, 120, 130, 140, 151, 190, 210, 230, 240, 245, 290, 310, 315, 320, 330, 340, 345, 350, 355, 360, 362, 365, 370, 371, 380, 385, 450, 891.
- ☐ IV. 220, 422, 423, 430, 460, 510, 530, 610, 620, 630, 640, 650, 660, 690, 810, 861-865, 870, 871, 875, 900.
- ☐ V. 150, 152, 153.
3. Title and number, if any, of related cases. (See local rule 40.1(g)). If more than one prior related case has been filed in this district please indicate the title and number of the first filed case in this court.
- None
4. Has a prior action between the same parties and based on the same claim ever been filed in this court?
- YES ☐ NO ☒
5. Does the complaint in this case question the constitutionality of an act of congress affecting the public interest? (See 28 USC §2403)
- YES ☐ NO ☒
- If so, is the U.S.A. or an officer, agent or employee of the U.S. a party?
- YES ☐ NO ☒
6. Is this case required to be heard and determined by a district court of three judges pursuant to title 28 USC §2284?
- YES ☐ NO ☒
7. Do all of the parties in this action, excluding governmental agencies of the United States and the Commonwealth of Massachusetts ("governmental agencies"), residing in Massachusetts reside in the same division? (See Local Rule 40.1(d)).
- YES ☐ NO ☒
- A. If yes, in which division do all of the non-governmental parties reside?
- Eastern Division ☐ Central Division ☐ Western Division ☐
- B. If no, in which division do the majority of the plaintiffs or the only parties, excluding governmental agencies, residing in Massachusetts reside?
- Eastern Division ☒ Central Division ☐ Western Division ☐
8. If filing a Notice of Removal - are there any motions pending in the state court requiring the attention of this Court? (If yes, submit a separate sheet identifying the motions)
- YES ☐ NO ☒

(PLEASE TYPE OR PRINT)

ATTORNEY'S NAME Ira H. ZaleznikADDRESS Lawson & Weitzen, LLP, 88 Black Falcon Avenue, Suite 345, Boston, MA 02210TELEPHONE NO. (617) 439-4990

JS 44 (Rev. 3/99)

CIVIL COVER SHEET

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

Terri James and Sonia Fernandez

(b) County of Residence of First Listed Plaintiff Florida
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

James S. Dilday, Esq.
Carlton J. Dasent, Esq.
27 School Street, Suite 400, Boston, MA 02108

DEFENDANTS

City of Revere, Thomas Ambrosino, Mayor, City of Revere Police Department, Terrence Reardon, Chief of Police, Bernard Foster, Salvatore Santoro, Roy Colannino, Frederick Roland, Thomas Doherty, John Nelson, James Russo, Michael Murphy and Steven Ford
County of Residence of First Listed Suffolk County

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

Ira H. Zaleznik
Lawson & Weitzen, LLP
88 Black Falcon Avenue, Suite 345,
Boston, MA 02210

Michael Akerson, Esq.
Austin M. Joyce, Esq.
Edward P. Reardon, PC
397 Grove Street, Worcester, MA

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State ☐ 1 ☐ 1 DEF Incorporated or Principal Place of Business in This State ☐ 4 ☐ 4 DEF
- Citizen of Another State ☐ 2 ☐ 2 DEF Incorporated and Principal Place of Business in Another State ☐ 5 ☐ 5 DEF
- Citizen or Subject of a Foreign Country ☐ 3 ☐ 3 DEF Foreign Nation ☐ 6 ☐ 6 DEF

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of <input type="checkbox"/> 160 Medicare Act <input type="checkbox"/> 170 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 180 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 190 Stockholders' Suits <input type="checkbox"/> 195 Contract Product Liability	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury—Med. Malpractice <input type="checkbox"/> 365 Personal Injury—Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/CC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 830 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input checked="" type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 Habeas Corpus: General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIW C/DIW W (405(g)) <input type="checkbox"/> 864 SSD Title XVI <input type="checkbox"/> 865 RS I (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609

V. ORIGIN (PLACE AN "X" IN ONE BOX ONLY)

- ☐ 1 Original Proceeding
- ☒ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from another district (specify)
- ☐ 6 Multidistrict Litigation
- ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

Civil Rights Claim 42 U.S.C. sec. 1983, Employment Discrimination/Sexual Harassment 42 U.S.C. sec. 2000 (e)(2)

VII. REQUESTED IN COMPLAINT: ☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: ☐ Yes ☐ No

VIII. RELATED CASE(S) IF ANY (See instructions):

JUDGE

DOCKET NUMBER

DATE
12/11/03

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

Civil Action COVER SHEET		DOCKET NO.(S) 03-4685	Document 2 Filed 01/08/2004 Page 18 of 18	Trial Court of Massachusetts Superior Court Department County:
PLAINTIFF(S) Terri Pechner-James Sonia Fernandez		DEFENDANT(S) City of Revere, Thomas Ambrosine, Mayor City of Revere, Police Department, Terrence Reardon, Chief et al		
ATTORNEY FIRM NAME, ADDRESS AND TELEPHONE James S. Dilday, Esq./Carlton Dasent Grayer & Dilday, 27 School Street, Boston, MA (617) 227-3470 Board of Bar Overseers number: 124360:114480		ATTORNEY (if known)		
Origin code and track designation				
Place an x in one box only:				
<input checked="" type="checkbox"/> 1. F01 Original Complaint		<input type="checkbox"/> 4. F04 District Court Appeal c.231, s. 97 & 104 (After trial) (X)		
<input type="checkbox"/> 2. F02 Removal to Sup.Ct. C.231,s.104 (Before trial) (F)		<input type="checkbox"/> 5. F05 Reactivated after rescript; relief from judgment/Order (Mass.R.Civ.P. 60) (X)		
<input type="checkbox"/> 3. F03 Retransfer to Sup.Ct. C.231,s.102C (X)		<input type="checkbox"/> 6. E10 Summary Process Appeal (X)		
TYPE OF ACTION AND TRACK DESIGNATION (See reverse side)				
CODE NO.	TYPE OF ACTION (specify)	TRACK	IS THIS A JURY CASE?	
B22	Employment Discrimination F		(X) Yes () No	
The following is a full, itemized and detailed statement of the facts on which plaintiff relies to determine money damages. For this form, disregard double or treble damage claims; indicate single damages only.				
TORT CLAIMS (Attach additional sheets as necessary)				
A. Documented medical expenses to date:				
1. Total hospital expenses				\$ 5000.00
2. Total Doctor expenses				\$ 2000.00
3. Total chiropractic expenses				\$
4. Total physical therapy expenses				\$
5. Total other expenses (describe)				\$ 7000.00
Subtotal \$				\$ 300,000.00
B. Documented lost wages and compensation to date				
C. Documented property damages to date				
D. Reasonably anticipated future medical and hospital expenses				\$ 50,000.00
E. Reasonably anticipated lost wages				\$ 000,000.00
F. Other documented items of damages (describe)				\$ 3,364,000.00
TOTAL \$				\$ 30,300,000.00
G. Brief description of plaintiff's injury, including nature and extent of injury (describe) Hostile work environment/Sexual harassment, Disparate treatment, Infliction of emotional distress, constructive discharge, post traumatic stress and denial of Disability Benefits. <div style="text-align: right;">\$ 26,934,000.00</div>				
CONTRACT CLAIMS (Attach additional sheets as necessary)				
Provide a detailed description of claim(s):				
TOTAL \$				
PLEASE IDENTIFY, BY CASE NUMBER, NAME AND COUNTY, ANY RELATED ACTION PENDING IN THE SUPERIOR COURT DEPARTMENT				
"I hereby certify that I have complied with the requirements of Rule 5 of the Supreme Judicial Court Uniform Rules on Dispute Resolution (SJC Rule 1:18) requiring that I provide my clients with information about court-connected dispute resolution services and discuss with them the advantages and disadvantages of the various methods."				
Signature of Attorney of Record <i>Carlton Dasent</i>				DATE: 9-30-03

AOTC-6 mtc005-11/99
A.O.S.C. 1-2000

I HEREBY ATTEST AND CERTIFY ON
 DEC. 31, 2003 THAT THE
 FOREGOING DOCUMENT IS A FULL,
 TRUE AND CORRECT COPY OF THE
 ORIGINAL ON FILE IN MY OFFICE,
 AND IN MY LEGAL CUSTODY.

MICHAEL JOSEPH DONOVAN
 CLERK / MAGISTRATE
 SUFFOLK SUPERIOR CIVIL COURT
 DEPARTMENT OF THE TRIAL COURT

By: *[Signature]*
 ASSISTANT CLERK